

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RAYMOND CHARLES ALBERT,

Defendant.

INDICTMENT

07 Cr.

07 CRIM. 445

MAY 21 2007

COUNT ONE

The Grand Jury charges:

1. From at least in or about April 2007, up to and including on or about May 19, 2007, in the Southern District of New York and elsewhere, RAYMOND CHARLES ALBERT, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RAYMOND CHARLES ALBERT, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A).

3. It was further a part and an object of the conspiracy that RAYMOND CHARLES ALBERT, the defendant, and others

JUDGE RAKOFF

known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(B).

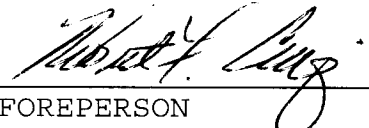
Overt Acts

4. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about late April 2007 or early May 2007, a co-conspirator not named as a defendant herein traveled to New York, New York to conduct a narcotics transaction.

b. On or about May 19, 2007, RAYMOND CHARLES ALBERT, the defendant, traveled to Queens, New York to pick up approximately four kilograms of heroin.

(Title 21, United States Code, Section 846.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(Title 21, United States Code,
Section 846)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL



Foreperson.

5-21-07 Filed Indictment Case assigned to J. Rukhoff
v/d Pitman
U.S.M.J.